

## TABLE OF CONTENTS

	Page
TABLE OF AUTHORITIES	i
Preliminary Statement	1
Standard of Review	2
Counter-Statements of Facts	3
ARGUMENT	4
<hr/> <u>DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT SHOULD BE DENIED SINCE THE REASON PROFFERED BY DEFENDANTS FOR PLAINTIFF'S TERMINATION WAS PRETEXTUAL</u>	4
DEFENDANT'S MOTION TO DISMISS SHOULD BE DENIED SINCE PLAINTIFF STATED A CAUSE OF ACTION PREDICATED UPON ESTABLISHING HE WAS SUBJECT TO AN ADVERSE EMPLOYMENT DECISION AND SUBJECTED TO PUBLICATION OF STIGMATIZING STATEMENTS PRIOR TO AFFORDING HIM AN OPPORTUNITY TO ESTABLISH THE FALSITY OF THE STATEMENTS	10
CONCLUSION	13